



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

AUG 14 2019

John W. Casella, Chairman, CEO and Secretary
Casella Waste Systems
25 Greens Hill Ln
Rutland, VT 05701

Re: Clean Air Act Reporting Requirement

Dear Mr. Casella:

The United States Environmental Protection Agency ("EPA") is evaluating whether Casella Waste Systems ("Casella") is in compliance with the Clean Air Act ("CAA" or "Act") and requirements promulgated under the Act, including but not limited to the Stratospheric Ozone Protection Regulations found at 40 CFR Part 82, Subpart F.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

Reporting Requirement

Provide the information described below for the period between January 1, 2014 and the date of this Reporting Requirement. Provide a separate response to each numbered paragraph or subparagraph below. Where possible, provide responses in an electronic spreadsheet format (preferably Microsoft Excel).

Your response is due within 45 days of the date of receipt of this Reporting Requirement.

1. Provide a list of Casella locations in Massachusetts that accept household appliances (such as air conditioners, refrigerators, dehumidifiers, etc.) containing refrigerant.

2. For each such location provide:
 - a. All records of equipment owned, rented, or leased for recovering refrigerant;
 - b. Copies of all training records of all employees or contractors who have recovered refrigerant; and
 - c. Copies of any documentation that you have regarding refrigerant recovery.
3. Describe Casella's procedures for disposing of appliances designed to contain refrigerant.
4. Provide copies of any policies, procedures, manuals, guidance or training documents, or standard operating procedures, used to inform employees, contractors, and the public of requirements, ordinances, or prohibitions for the disposal of any appliances designed to contain refrigerant.
5. If Casella maintains written contracts/agreements with outside parties (e.g., waste haulers, scrap metal recyclers) concerning the collection, transfer, and disposal of appliances designed to contain refrigerant, provide:
 - a. Copies of these contracts/agreements, including but not limited to those with Sullivan Metals or any of its subsidiaries; and
 - b. Copies of all invoices, receipts, payment or credit records, for disposal of appliances of recovered refrigerant shipped offsite.

Be aware that if Casella does not provide the information required in this Reporting Requirement in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you.

Provide the above-required information to:

US EPA Region 1
Enforcement and Compliance Assurance Division
Air Compliance Section
Mail Code: 04-2
5 Post Office Square, Suite 100
Boston, MA, 02109-3912
Attn: Abdi Mohamoud

If you have any questions regarding this Reporting Requirement, please contact Abdi Mohamoud at (617) 918-1858 or have your attorney call Tom Olivier at (617) 918-1737.

Sincerely,



Karen McGuire, Director
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency
Region I

8-14-19
Date

cc: Saadi Motamedi, MA DEP